

February 10, 2003

Ms. Alicia Davenport  
Speedway SuperAmerica #7887  
P.O. Box 1500  
Springfield, OH 45501

Re: Exempt Construction and Operation Status,  
097-15456-00427

Dear Ms. Davenport:

The application from Speedway SuperAmerica Store #7887, received on November 26, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following underground tanks located at 5415 East 65<sup>th</sup> Street, Indianapolis, Indiana 46220 is classified as exempt from air pollution permit requirements:

The source consists of the following process/equipment:

- (a) Two (2) gasoline underground storage tanks, with a capacity of 12, 000 gallons, with Dual Point vapor recovery system.
- (b) One (1) gasoline underground storage tank, with a capacity of 10, 000 gallons, with Dual Point vapor recovery system.
- (c) One (1) diesel underground storage tank, with a capacity of 10, 000 gallons, with Dual Point vapor recovery system.
- (d) One (1) kerosene underground storage tank with a capacity of 4,000 gallons, with Dual Point vapor recovery system.

Pursuant to 326 IAC 2-1.1-3 (d)(1)(H), sources emitting less than one (1) ton per year of a single hazardous air pollutant (HAP) or two and five-tenths (2.5) tons per year of any combination of HAPs listed pursuant to section 112(b) of the CAA are exempt from the registration and permitting requirements of 326 IAC 2.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

- (2) Pursuant to 326 IAC 8-4-6, no owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless such tank is equipped with the following:

- (1) A submerged fill pipe.
- (2) Either a pressure relief valve set to release at no less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.
- (3) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.

If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is connected between the transport and the storage tank and is operating according to manufacturer's specifications.

- (3) Pursuant to 326 IAC 8-9-6(b), the owner or operator of each vessel shall maintain a record and submit to the department a report containing the following information for each vessel:

- (1) The vessel identification number.
- (2) The vessel dimensions.
- (3) The vessel capacity.

This exemption is the first air approval issued to this source. The source may operate according to 326 IAC 2-1.1-3.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source. If you have any questions, please feel free to contact Angelique Oliger at (317) 327-2846 or [aoliger@indygov.org](mailto:aoliger@indygov.org).

Sincerely,  
Original Signed by John B. Chavez

John B. Chavez, Administrator  
Office of Environmental Services  
City of Indianapolis

#### Attachment

aco

cc: File-Marion County  
Air Compliance, Matt Mosier  
IDEM, Mindy Hahn  
Permits, Angelique Oliger

**Indiana Department of Environmental Management  
Office of Air Quality  
And  
City of Indianapolis  
Office of Environmental Services**

**Technical Support Document (TSD) for an Exemption**

**Source Background and Description**

**Source Name:** Speedway SuperAmerica #7887  
**Source Location:** 5415 East 65<sup>th</sup> Street, Indianapolis, Indiana 46220  
**County:** Marion  
**SIC Code:** 5541  
**Operation Permit No.:** 097-15456-00427  
**Permit Reviewer:** Angelique Oliger

The City of Indianapolis Office of Environmental Services (OES) and the Office of Air Quality (OAQ), have reviewed an application for an exemption, from Speedway SuperAmerica #7887 for underground storage tanks.

The underground storage tanks will involve emissions from a dual point recovery system. The emission from these pieces of equipment will contain hazardous air pollutants. However, the underground storage tanks do not meet the criteria for an air permit and thus, should receive an exemption.

**Proposed Emission Unit**

The source consists of the following process/equipment:

- (a) Two (2) gasoline underground storage tanks, with a capacity of 12, 000 gallons, with Dual Point vapor recovery system.
- (b) One (1) gasoline underground storage tank, with a capacity of 10, 000 gallons, with Dual Point vapor recovery system.
- (c) One (1) diesel underground storage tank, with a capacity of 10, 000 gallons, with Dual Point vapor recovery system.
- (d) One (1) kerosene underground storage tank with a capacity of 4,000 gallons, with Dual Point vapor recovery system.

**Existing Approvals**

There are no existing approvals issued to this source.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Administrator that the Exemption be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 26, 2001. No additional information was received.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution agency”.

The following table reflects the existing source potential to emit. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit:

Pollutant	Potential To Emit (tons/year)
PM	negligible
PM-10	negligible
SO <sub>2</sub>	negligible
VOC	negligible
CO	negligible
NO <sub>x</sub>	negligible

- (c) The potential to emit (as defined in 326 IAC 2-7-1 (29)) of the pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3.

### Actual Emissions

No previous emission data has been received from the source.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (b) Marion County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, Ozone, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	negligible
PM <sub>10</sub>	negligible
SO <sub>2</sub>	negligible
VOC	negligible
CO	negligible
NO <sub>x</sub>	negligible
Single HAP	negligible
Combination haps	negligible

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) Each criteria pollutant is less than 100 tons per year,
- (b) A single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) Any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source at this location.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. Storage vessels located at gasoline service stations are not subject to 40 CFR Part 60 Subpart Kb. Therefore, this source is not subject to 40 CRF Part 60 Subpart Kb.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR part 63) applicable to this source.

## **State Rule Applicability - Entire Source**

### **326 IAC 1-6-3 (Preventive Maintenance Plan)**

Only sources required to obtain a permit are required to prepare and maintain a Preventive Maintenance Plan (PMP). The potential to emit regulated air pollutants appears to be below any minimum permitting threshold or permitting provisions found in 326 IAC 2-1.1-2 (Permit Review Rules: General Provisions; Applicability) and or 326 IAC 2-5.1 (Construction of New Sources).

### **326 IAC 2-4.1(HAPs Major Sources; New Source Toxics Control)**

The source has the potential to emit of less than ten (10) tons per year of single HAP and less than twenty-five (25) tons per year of any combination of HAPs. Therefore 326 IAC 2-4.1 does not apply.

### **326 IAC 2-6 (Emission Reporting)**

This source is not subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit less than ten (10) tons per year of NO<sub>x</sub> and/or VOC in Marion County and less than one hundred (100) tons per year of Particulate Matter (PM). In addition, the potential to emit HAPs is less than any major source threshold and, as such, is not required to obtain a permit under 326 IAC 2-7 (Part 70 Permit Program). As a result, 326 IAC 2-6 (Emission Reporting) does not apply.

### **326 IAC 5-1 (Visible Emissions Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **326 IAC 6 (Particulate Rules)**

- (a) This source does not have the potential to emit Particulate Matter (PM) in excess of one hundred (100) tons per year or have actual PM emissions of greater than ten (10) tons per year. Therefore, 326 IAC 6-1 does not apply to this source.
- (b) This rule establishes emission limitations for particulate emissions from process operations located anywhere in the state. This source does not have particulate emissions. Therefore, 326 IAC 6-3 does not apply to this source.

### **326 IAC 7 (Sulfur Dioxide Rules)**

This source does not have any emission unit with the potential to emit twenty five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. Therefore, 326 IAC 7 does not apply to this source.

### **326 IAC 8 (Volatile Organic Compound Rules)**

- (a) The potential to emit of the underground storage tanks is less than 25 tons per year, therefore, 326 IAC 8-1-6 does not apply.
- (b) Pursuant to 326 IAC 8-4-6, no owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless such tank is equipped with the following:
  - (1) A submerged fill pipe.
  - (2) Either a pressure relief valve set to release at no less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.
  - (3) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is connected between the transport and the storage tank and is operating according to manufacturer's specifications.
- (c) Pursuant to 326 IAC 8-9-6(b), the owner or operator of each vessel shall maintain a record and submit to the department a report containing the following information for each vessel:
  - (1) The vessel identification number.
  - (2) The vessel dimensions.
  - (3) The vessel capacity.
- (d) There are no other 326 IAC 8 rules applicable to source.

## Conclusion

The underground storage tanks proposed for Speedway SuperAmerica #7887 located at 5415 East 65<sup>th</sup> Street, Indianapolis, Indiana 46220 shall be subject to the conditions of the attached exemption 097-15456-00427.